

August 17, 2005

Mr. Marco Boyce, RLA Morris & Ritchie Associates 18 Boulden Circle Suite 36 New Castle, DE 19720

RE: PLUS Review 2005-07-12, Tidbury Crossing

Dear Mr. Boyce,

Thank you for meeting with State agency planners on July 27, 2005 to discuss the proposed plans for the Tidbury Crossing project to be located on 39 acres on Lochmeath Way in the Town of Camden. According to the information received, you are seeking to construct 244 residential units.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as the Town of Camden is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the Town.

Executive Summary

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The full text of this letter represents the official state response to this project. Our office notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.

State Strategies/Project Location

This project is located in Investment Level 1, which is where the State supports and encourages infill, redevelopment, and new development activities such as this project. The State commends the town and developer for working closely together to create a "Traditional Neighborhood Development" style design that will fit into the character of the town.

Street Design and Transportation

The current design shows three access points on Lockmeath way. While we understand the design goal of an interconnected grid street pattern, it is uncertain if three access points will be permitted. The Town and the developer should work closely with DelDOT to integrate this development's proposed street pattern into the local transportation system.

It is recommended that the stub streets be extended to the western property line and realigned in anticipation of future extension to Upper King Road.

Natural and Cultural Resources

A portion of this site is in an excellent recharge area. A map is attached. The developer is encouraged to use "best management practices" to minimize imperviousness on the site.

Office of State Planning Coordination – Contact David Edgell 739-3090

This project is located in Investment Level 1 according to the *Strategies for State Policies and Spending*. This site is also located in the Town of Camden. Investment Level 1 reflects areas that are already developed in an urban or suburban fashion, where infrastructure is existing or readily available, and where future redevelopment or infill projects are expected and encouraged by State policy. Our office has no objections to the proposed subdivision and development of this project in accordance with the relevant Town codes and ordinances.

We would like to commend the Town and the developer for working closely together to design a "Traditional Neighborhood Development" that integrates well into the character of the town. The mixture of housing types, pedestrian orientation, central open space, and interconnections with nearby neighborhood and commercial areas will all add to the quality and diversity of this new community. Our office encourages both the developer and the town to work closely with DelDOT to integrate the proposed local street network in this development into the transportation system in the area.

<u>Division of Historic and Cultural Affairs – Contact Alice Guerrant 739-5685</u>

Nothing is known on this parcel. It is across Lochmeath Way from a late 19th-early 20th-century house (K-3822), which appears to be already well shielded by landscaping from this development. There is only a low potential for historic-period archaeological sites, but there are areas of high to medium potential for prehistoric-period archaeological sites. If the stream crossing to tie this development to the one immediately north requires an Army Corps of Engineers permit, the developer will be required to consult with this office under Section 106 of the National Historic Preservation Act of 1966 (as amended) and may be required to undertake an archaeological survey, depending on the area of effect that the Corps would determine. If no federal permit is required, DHCA would appreciate an opportunity to check the field for archaeological sites, to learn something about their location and character before any ground-disturbing activities take place.

<u>Department of Transportation - Contact Bill Brockenbrough 760-2109</u>

Anderson Homes seeks to develop 244 dwellings (108 single-family detached houses and 136 townhouses) on an approximately 39-acre parcel (Tax Parcel NM-02-094.00-01-28.00-000). The subject land is located on the north side of Lochmeath Way (Kent Road 361) between US Routes 13 and 13A. The land is zoned R in the Town of Camden and it would be developed by right. It is the residential (west) part of the Mardella Property, the commercial (east part) of which is being developed under the name Camden Station.

- 1) Lochmeath Way is classified as a local road. Local roads in Delaware typically have right-of-way widths ranging from 33 to 50 feet. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 30 feet from the centerline on local roads. Therefore right-of-way dedication will be required along the frontage to provide any additional width needed from this project.
- 2) DelDOT will require that a sidewalk or a paved multi-modal path be provided across the frontage of the site. The developer's site engineer should contact the project manager for Kent County, Mr. Brad Herb, regarding specific requirements. Mr. Herb may be reached at (302)266-9600.
- The Conceptual Site Plan shows stub street connections to the east and north. The stub street to the east appears to line up properly as part of Mardella Drive, which would be a private street through Camden Station. The stub street to the north is apparently intended to tie into Newell's Creek. That development was recorded without a stub street but DelDOT understands that the Town is working with the developer of Newell's Creek to rerecord the plan and provide a stub street. The developer is encouraged to work with the Town to make sure that both stub streets from Tidbury Crossing are located properly so that they can build the connections to the adjacent developments.

- Three entrances are shown on Lochmeath Way. While that may be acceptable, DelDOT cannot guarantee at present that more than one entrance will be permitted. The developer's site engineer should contact Mr. Herb regarding specific requirements.
- Two east-west streets are shown terminating in T-turnarounds. While the turnarounds are acceptable, the street right-of-ways should be extended as stubs to the property line. Presently a strip subdivision along Route 13A prevents the extension of these streets to that road. However, good planning dictates that their future extension should be provided for. Further in that regard, their spacing along Route 13A relative to each other and Lochmeath Way should be evaluated and the alignment of the streets adjusted as necessary.
- DART First State presently provides transit service to Camden Town Center by means of Route 104 (Camden-Mifflin Meadows). The developer should be required to provide for pedestrian access to Camden Town Center both to allow for walking trips to that destination and to provide access to transit. More information is available concerning Route 104 from Mr. Wayne Henderson, Service Development Planner for the Delaware Transit Corporation. Mr. Henderson may be reached at (302)577-3278, extension 3553.

The Department of Natural Resources and Environmental Control Contact Kevin Coyle 739-9071

Soils

Based on Kent County soil survey mapping, Johnston was mapped along the northern boundary of subject parcel. Johnston is a very poorly-drained wetland associated (**hydric**) floodplain soil that has severe limitations for development.

Wetlands

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of palustrine forested riparian wetlands. PLUS application materials indicate that wetlands have not been delineated; the applicant is advised to do so. This delineation should be verified Corps of Engineers through the Jurisdictional Determination process.

Impacts to wetlands should be avoided and vegetated buffers of no less than 100 feet should be employed from all wetlands and water bodies. Lots should exclude all wetlands and associated buffers. The developer should note that both DNREC and Army Corps of Engineers discourage allowing lot lines to contain wetlands to minimize potential cumulative impacts resulting from unauthorized and/or illegal activities and disturbances that can be caused by homeowners.

Impacts to Palustrine wetlands are regulated by the Army Corps of Engineers through Section 404 of the Clean Water Act. In addition, individual 404 permits and certain Nationwide Permits from the Army Corps of Engineers also require 401 Water Quality

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Certification from the DNREC Wetland and Subaqueous Land Section and Coastal Zone Federal Consistency Certification from the DNREC Division of Soil and Water Conservation, Delaware Coastal Programs Section. Each of these certifications represents a separate permitting process. Impacts to streams and associated riparian wetlands, including road crossings, are regulated by the DNREC Wetlands and Subaqueous Lands Section, and by the Corps of Engineers.

To find out more about permitting requirements, the applicant is encouraged to attend a Joint Permit Process Meeting. These meetings are held monthly and are attended by federal and state resource agencies responsible for wetland permitting. Contact Denise Rawding at (302)739-4691 to schedule a meeting.

Riparian Buffer

It should be noted that this parcel borders or contains headwater or near headwater riparian wetlands (Newell Branch) which eventually drain to the environmentallysensitive St. Jones River subwatershed of the Delaware Bay. Headwater riparian wetlands are important for the protection of water quality and the maintenance/integrity of the ecological functions throughout the length of the stream, including the floodplain system and/or water bodies (St. Jones) further downstream. Since such streams are a major avenue for nutrient-laden stormwater and sediment runoff, their protection deserves the highest priority. In recognition of this concern, the Department strongly recommends that the applicant preserve the existing riparian buffer in its entirety. Otherwise – as mentioned previously - a 100-foot upland buffer width is the minimum acceptable distance that should be maintained between all wetlands and water bodies (including ditches). Lot lines, roadways, and stormwater management ponds should not be located within this buffer zone. In cases where natural buffer vegetation has been removed or reduced by past development or farming activities, the developer is encouraged to restore/establish to said buffer width or greater with native herbaceous and/or woody vegetation.

Impervious Cover

Since residential development significantly increases the amount of impervious cover - leading to large volumes of contaminant-laden runoff which ultimately drain into streams or waterways - the applicant is strongly urged to pursue both natural and constructed Best Management Practices (BMPs) to reduce such impacts. Reducing the amount of impervious surface through the planting/preservation of trees (especially adjacent to wetlands/waterways), and the use of pervious paving surfaces ("pavers") in lieu of asphalt or concrete - are examples of ways to reduce such impacts. Research has consistently shown that once a watershed exceeds a threshold of 10 percent imperviousness, water and habitat quality irreversibly decline.

TMDLs

A Total Maximum Daily Load (TMDL) is the maximum level of pollution for which a water quality limited water body can assimilate without compromising use and recreational goals such as swimming, fishing, drinking water, and shell fish harvesting.

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Although TMDLs as a "pollution runoff mitigation strategy" to reduce nutrient loading have not yet been developed for the St. Jones subwatershed to date, work is continuing on their development and they should be completed by December 2006.

Therefore, until the specified TMDL reductions and pollution control strategies are adopted, it shall be incumbent upon the developer to employ best available technologies (BATS) and/or best management practices (BMPs) as "methodological mitigative strategies" to reduce degradative impacts associated with development. Reducing imperviousness, planting trees, and maintaining at least a 100-foot upland buffer from all streams and wetlands are some examples of mitigative strategies to reduce nutrient runoff impacts.

Water Resource Protection Areas

The DNREC Water Supply Section has determined that the northeastern part of the proposed development falls within an area of excellent groundwater recharge (see map 1 following and attached map). The western part of the parcel outlined in the area is the focus of this review. The proposed development would change the total impervious cover from approximately 0% to approximately 30%. The numbers were provided by the developer on the PLUS application.

Map 1: Tidbury Crossing (PLUS 2005-07-12) with excellent recharge in green and affected parcels outlined in light blue.

According to the State law that created the Source Water Protection Program, county and municipal governments with more than 2,000 residents will be required to enact ordinances to protect Water Resource Protection Areas. Municipalities with fewer than 2,000 residents are encouraged to enact such ordinances. The following language has been excerpted from the Source Water Protection Guidance Manual for Local Governments, Supplement 1 - Ground-Water Recharge Design Methodology. While the local ordinances may not yet be in place, the developer may find the language useful in modifying the site plan to protect water resources.

Water Resource Protection Areas (WRPAs) are defined as (1) surface water areas such as floodplains, limestone aquifers, and reservoir watersheds, (2) wellhead areas, or (3) excellent recharge areas. The purpose of an impervious cover threshold is to minimize loss of recharge and protect the quality and quantity of ground and surface water supplies in WRPAs. New development in WRPAs may exceed the 20% impervious cover threshold, but be no more than 50% impervious, provided the applicant submits an environmental assessment report recommending a climatic water budget and facilities to augment recharge. The environmental assessment must document that post-development recharge will be no less than predevelopment recharge when computed on an annual basis.

Commonly, the applicant offsets the loss of recharge due to impervious cover by constructing recharge basins that convey relatively pure rooftop runoff for infiltration to

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ground water. The Department recommends the following (ranked in order of preference):

- 1) Preserve WRPAs as open space and parks by acquisition or conservation easement.
- 2) Limit impervious cover of new development to 20% by right within WRPAs.
- 3) Allow impervious cover of new development to exceed 20% within WRPAs (but no more than 50% impervious) provided the applicant develops recharge facilities that directly infiltrate rooftop runoff.
- 4) Allow impervious cover of new development to exceed 20% within WRPAs (but no more than 50% impervious) provided the applicant develops recharge facilities that infiltrate stormwater runoff from forested and/or grassed surfaces with pretreatment.

For more information, refer to:

Source Water Protection Guidance Manual for the Local Governments of Delaware at http://www.wr.udel.edu/swaphome/phase2/SWPguidancemanual.html and

Ground-Water Recharge Design Methodology at http://www.wr.udel.edu/swaphome/phase2/Publications/swapp_manual_final/swapp_gui dance manual supp 1 2005 05 02.pdf

Water Supply

Please note that the tax map number shown on the application is newer than the original tax map number. According to ARCVIEW, this original number is NM 103.00-01-19.00. The project information sheets state water will be provided to the project by Tidewater Utilities via a central water system. Records indicate that the project is located within the public water service area granted to Tidewater Utilities under Certificate of Public Convenience and Necessity PSC-1190.

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation. All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows time for technical review and advertising. Contact Rick Rios at (302)739-9944.

Sediment and Erosion Control/Stormwater Management

A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. The plan review and approval as well as construction inspection will be coordinated through Kent Conservation District. Contact Jared Adkins at (302)741-2600, ext. 3, for details regarding submittal requirements and fees. As of

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April 11, 2005, stormwater best management practices must also consider water quality as well as quantity in impaired water bodies.

Drainage

There are existing drainage problems on Newell Branch, downstream of this project. The Drainage Program requests that all precautions be taken to ensure the project does not hinder any off site drainage upstream of the project or create any off site drainage problems downstream by the release of on site storm water. The Drainage Program requests that Newell Branch be checked for function and cleaned, if needed, prior to the construction of homes. Wetland permits may be required before cleaning the branch.

Due to existing drainage conditions downstream, the Drainage Program requests the developer to discuss infiltration and the delay release of stormwater as some of the methods of managing stormwater on this site with Jared Adkins of the Kent Conservation District. The Drainage Program encourages stormwater infiltration in suitable areas.

The Drainage Program does not have a clear understanding how stormwater will be conveyed to the stormwater management area. Because of concerns for future maintenance of drainage conveyances, the Drainage Program requests the majority of the stormwater pipes on this project be located on drainage and utility easements along the streets.

The Drainage Program requests the routing of major stormwater pipes through yards be prohibited. The Drainage Program discourages the placement of catch basins in the rear and side yards. The Drainage Program promotes the elevation of rear yards to direct stormwater towards the street for accessible maintenance of stormwater pipes.

With respect to future maintenance of drainage conveyances within the proposed subdivision that cannot be located along a street, the Drainage Program strongly recommends said drainage conveyances be dedicated as a drainage easement and such easement be designated as passive open space, not owned by individual landowners. Designation as open space will aid in the prevention of open decks, stairs, ramps, sheds, fences, and kennels placed along the drainage conveyance preventing the maintenance of said conveyance.

Nuisance Waterfowl

Stormwater management ponds that remain in the site plan may attract waterfowl like resident Canada geese and mute swans. High concentrations of waterfowl in ponds create water-quality problems, leave droppings on lawn and paved areas and can become aggressive during the nesting season. Short manicured lawns around ponds provide an attractive habitat for these species. We recommend native plantings of tall grasses, wildflowers, shrubs, and trees at the edge and within a buffer area (50 feet) around the perimeter. Waterfowl do not feel safe when they can not see the surrounding area for possible predators. These plantings should be completed as soon as possible as it is easier to deter geese when there are only a few than it is to remove them once they become plentiful. The Division of Fish and Wildlife does not provide goose control services, and

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if problems arise, residents or the home-owners association will have to accept the burden of dealing with these species (e.g., permit applications, costs, securing services of certified wildlife professionals). Solutions can be costly and labor intensive; however, with proper landscaping, monitoring, and other techniques, geese problems can be minimized.

Solid Waste

Each Delaware household generates approximately 3,600 pounds of solid waste per year. On average, each new house constructed generates an additional 10,000 pounds of construction waste. Due to Delaware's present rate of growth and the impact that growth will have on the state's existing landfill capacity, the applicant is requested to be aware of the impact this project will have on the State's limited landfill resources and, to the extent possible, take steps to minimize the amount of construction waste associated with this development.

Air Quality

Once complete, vehicle emissions associated with this project are estimated to be 19.6 tons (39,139.8 pounds) per year of VOC (volatile organic compounds), 16.2 tons (32,405.1 pounds) per year of NOx (nitrogen oxides), 12.0 tons (23,909.1 pounds) per year of SO2 (sulfur dioxide), 1.1 ton (2,128.3 pounds) per year of fine particulates and 1,637.0 tons (3,273,997.7 pounds) per year of CO2 (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 7.9 tons (15,786.9 pounds) per year of VOC (volatile organic compounds), 0.9 ton (1,737.0 pounds) per year of NOx (nitrogen oxides), 0.7 ton (1,441.5 pounds) per year of SO2 (sulfur dioxide), 0.9 ton (1,860.2 pounds) per year of fine particulates and 32.0 tons (63,996.5 pounds) per year of CO2 (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 3.1 tons (6,256.8 pounds) per year of NOx (nitrogen oxides), 10.9 tons (21,762.7 pounds) per year of SO2 (sulfur dioxide) and 1,605.0 tons (3,210,001.2 pounds) per year of CO2 (carbon dioxide).

	VOC	NOx	SO_2	PM _{2.5}	CO ₂
Mobile	19.6	16.2	12.0	1.1	1637.0
Residential	7.9	0.9	0.7	0.9	32.0
Electrical		3.1	10.9		1605.0
Power					
TOTAL	27.5	20.2	23.6	2.0	3274.0

For this project the electrical usage via electric power plant generation alone totaled to produce an additional 3.1 tons of nitrogen oxides per year and 10.9 tons of sulfur dioxide per year. A significant method to mitigate this impact would be to require the builder to construct Energy Star qualified homes. Every percentage of increased energy efficiency

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translates into a percent reduction in pollution. Quoting from their webpage, http://www.energystar.gov/:

"ENERGY STAR qualified homes are independently verified to be at least 30% more energy efficient than homes built to the 1993 national Model Energy Code or 15% more efficient than state energy code, whichever is more rigorous. These savings are based on heating, cooling, and hot water energy use and are typically achieved through a combination of:

building envelope upgrades, high performance windows, controlled air infiltration, upgraded heating and air conditioning systems, tight duct systems and upgraded water-heating equipment."

The energy office in DNREC is in the process of training builders in making their structures more energy efficient. The Energy Star Program is an excellent way to save on energy costs and reduces air pollution. DNREC recommends that this project and other residential proposals increase the energy efficiency of their homes.

DNREC also recommends that the home builders offer geothermal and photo voltaic energy options. Applicable vehicles should use retrofitted diesel engines during construction. The development should provide tie-ins to the nearest bike paths and links to mass transport system, and fund a lawnmower exchange program for their new occupants

State Fire Marshal's Office – Contact Duane Fox 739-4394

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal's Office. At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

Fire Protection Water Requirements

- ➤ Where a water distribution system is proposed for single family dwellings it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 1000 feet spacing on centers are required.
- Where a water distribution system is proposed for townhouse type dwellings it shall be capable of delivering at least 1000 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 800 feet spacing on centers are required.
- > The infrastructure for fire protection water shall be provided, including the size of water mains.

Accessibility

- All premises which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from Lochmeath Way must be constructed so fire department apparatus may negotiate it.
- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- ➤ The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- ➤ The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

Gas Piping and System Information

> Provide type of fuel proposed, and show locations of bulk containers on plan.

Required Notes

- ➤ Provide a note on the final plans submitted for review to read "All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations"
- ➤ Name of Water Supplier
- Proposed Use
- ➤ National Fire Protection Association (NFPA) Construction Type
- Townhouse 2-hr separation wall details shall be shown on site plans
- Maximum Height of Buildings (including number of stories)
- Provide Road Names, even for County Roads.

Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from www.delawarestatefiremarshal.com.

Department of Agriculture - Contact Milton Melendez 698-4500

The Delaware Department of Agriculture has no objections to the Tidbury Crossing application. The site is located within a designated controlled development area which is supportive of the *Strategies for State Policies and Spending* encouraging responsible

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development in within Level 1 areas; the Delaware Department of Agriculture supports growth in these areas.

Improved Landscape Design

The Delaware Department of Agriculture encourages the developer to use the "Right Tree for the Right Place" for any design considerations. This concept allows for the proper placement of trees to increase property values in upwards of 25% of appraised value and will reduce heating and cooling costs on average by 20 to 35 dollars per month. In addition, a landscape design that encompasses this approach will avoid future maintenance cost to the property owner and ensure a lasting forest resource.

Native Landscapes

The Delaware Department of Agriculture encourages the developer to use native trees and shrubs to buffer the property from the adjacent land-use activities near this site. A properly designed forested buffer can create wildlife habitat corridors and improve air quality to the area by removing six to eight tons of carbon dioxide annually and will clean rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to local landscapes, contact the Delaware Department of Agriculture Plant Industry Section at (302)698-4500.

Public Service Commission - Contact Andrea Maucher 739-4247

Application notes Tidewater, but it appears that the project is with the Camden-Wyoming Sewer & Water Authority's certificated service territory. Tidewater abandoned its CPCN for the project area, and a CPCN was granted to CWS&WA: PSC Order No. 6544, signed 12/21/04. If the project connects to public wastewater services from the Town, and the project lies outside of the service territory established in October 2004, then the Town must update the information it filed with the Commission. Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines.

Delaware State Housing Authority – Contact Jimmy Atkins 739-4263

This proposal is to develop 255 units on 39 acres located on the north side of Lockmeath Way between US 13 and 13 A and between Lochmeath Way and Newell Branch in the Town of Camden. According to the *Strategies for State Policies and Spending*, the site located in a Level 1 area and inside the growth zone. As a general planning practice, DSHA encourages residential development in these areas where residents will have proximity to services, markets, and employment opportunities. The proposal targets units for first time homebuyers, which will help to create affordable housing opportunities for low- and moderate-income families.

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of

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the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.

Thank you for the opportunity to review this project. If you have any questions, please contact me at (302)739-3090.

Sincerely,

Constance C. Holland, AICP

Director

CC: Town of Camden

